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February 6, 2023

Via ECF

Hon. Jesse M. Furman
U.S. District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Khalid Alboushari, 19 cr 17
Request for a 30-day Extension of Motion Schedule and Conference

Dear Judge Furman:

I represent Mr. Khalid Alboushari on the above-captioned matter. I write with the consent of the Government to respectfully request for a 30-day extension of the motion schedule and pre-trial conference.

This is the first adjournment request of the motion schedule and the pre-trial conference. Currently, the Defense motions are due by February 9, 2023, opposition is due by February 23, 2023, and replies are due by March 2, 2023. The pre-trial conference is scheduled for February 16, 2023. Defense respectfully submits that this adjournment is necessary to permit defense counsel a reasonable time necessary for effective preparation in this matter and to allow the parties to conduct plea negotiations.

I have conferred with AUSA James Ligtenberg and he consents to this adjournment. The parties are available for a pre-trial conference any time in mid-late March with the exception of March 16 and March 17, 2023.

Thank you for your time and consideration of this request.

Respectfully Submitted,

s/ Elena Fast
Elena Fast, Esq.
Counsel for Khalid Alboushari